

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

LIFE AFTER HATE, INC., a/k/a EXITUSA,)	
)	
Plaintiff,)	Case No. 18-cv-06967
)	
v.)	Judge Virginia M. Kendall
)	
FREE RADICALS PROJECT, INC., and)	Magistrate Judge Jeffrey Cole
CHRISTIAN PICCIOLINI,)	
)	
Defendants.)	

MOTION TO WITHDRAW AS COUNSEL

Eugene J. Geekie, Jr., Joseph M. Kuo, Michael Jacobson, Danielle LaHee, and Andrew Bollinger, co-counsel of record for Defendants/Counter-Plaintiffs Free Radicals Project, Inc. (“FRP”) and Christian Picciolini, and pursuant to Local Rule 83.17 of the United States District Court for the Northern District of Illinois, respectfully request that this Court grant them leave to withdraw their appearances of record in this matter.

1. Attorneys Geekie, Kuo, Jacobson, LaHee, and Bollinger, of the law firm of Saul Ewing Arnstein & Lehr LLP, have stated to Free Radicals Project, Inc. and Mr. Picciolini that they will no longer represent FRP and Mr. Picciolini, because of a breakdown of the attorney client relationship, and that they will withdraw their appearances in this matter.

2. FRP and Mr. Picciolini are also represented in this matter by Daniel Klapman, of the law firm of Fisher, Cohen, Waldman Shapiro LLP, who has also appeared as counsel of record and is a member of the bar of this Court. Mr. Klapman will continue to represent FRP and Mr. Picciolini in this matter.

3. FRP and Mr. Picciolini have received notice and a copy of this motion.

4. Accordingly, attorneys Geekie, Kuo, Jacobson, LaHee, and Bollinger seek leave to withdraw their appearances on behalf of FRP and Mr. Picciolini.

WHEREFORE, Eugene J. Geekie, Jr., Joseph M. Kuo, Michael Jacobson, Danielle LaHee, and Andrew Bollinger respectfully request that this Court enter an order granting each of them leave to withdraw as counsel for Free Radicals Project, Inc. and Christian Picciolini, terminating their appearances in this matter and to terminate notifications to them in this matter.

Dated: January 31, 2020

Respectfully submitted.

s/ Eugene J. Geekie, Jr.
Eugene J. Geekie, Jr. – ARDC No. 6195060

s/ Joseph M. Kuo
Joseph M. Kuo – ARDC No. 6216400

/s Michael Jacobson
Michael Jacobson – ARDC No. 6313122

/s Danielle LaHee
Danielle LaHee – ARDC No. 6327199

/s Andrew Bollinger
Andrew Bollinger – ARDC No. 6326604

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CERTIFICATE OF SERVICE

I hereby certify that on January 31, 2020, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, and thereby caused it to be served on all counsel of record registered to receive such service, and also served via U.S. Mail:

Free Radicals Project, Inc.
917 W. Washington Blvd. #213
Chicago, IL 60607

Christian Picciolini
1000 W. Washington Blvd. #505
Chicago, IL 60607

/s/ Eugene J. Geekie, Jr.